

02D09-2109-CT-000484

Allen Superior Court 9

Filed: 9/14/2021 10:35 AM

Clerk

Allen County, Indiana

JS

STATE OF INDIANA) IN THE ALLEN SUPERIOR COURT
) SS:
COUNTY OF ALLEN) CAUSE NUMBER:
)
BRANDII JOHNSON,)
)
Plaintiff,)
)
vs.)
)
WAL-MART STORES EAST,)
LP, D/B/A WALMART)
SUPERCENTER,)
)
Defendant.)

COMPLAINT FOR DAMAGES

COMES NOW, Bandon Johnson ("Plaintiff"), by counsel, Glaser & Ebbs, alleges and seeks relief as follows:

1. At all times relevant herein, Plaintiff was and is a resident of the State of Wisconsin.
2. At all times relevant herein, upon information and belief, Wal-Mart Stores East, LP, d/b/a WalMart Supercenter ("Defendant"), is a foreign limited partnership licensed and doing business in the State of Indiana on January 5, 2020.
3. On or about January 5, 2020, Plaintiff was on the premises of a store owned and/or operated and/or maintained by Defendant, in Allen County, State of Indiana (located at 7502 Southtown Crossing, Fort Wayne, IN 46816).
4. As the Plaintiff was walking on the premises of the store owned and/or operated and/or maintained by Defendant, she slipped and fell on grease.
5. Plaintiff's fall was a direct and proximate result of the negligence of Defendant, such negligence including but not limited to failing to remove water from the premises, and failing to maintain the premises in a reasonably safe condition.

6. As a direct and proximate result of the negligence of Defendant, Plaintiff has suffered personal injuries.

WHEREFORE, Plaintiff, Brandii Johnson, by counsel, prays that a judgment be entered in her favor and against Defendant Wal-Mart Stores East LP, d/b/a Walmart Supercenter in an amount commensurate with her damages, and for all other just and proper relief in the premises.

Respectfully submitted,

/s/Michael A. Busching
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